

EXHIBIT F

Carol Kupferberg

From: Max Moskowitz
Sent: Wednesday, January 13, 2021 6:48 PM
To: compliance@tucows.com; Max Moskowitz; Carol Kupferberg
Subject: FW: 3986 1 Tucows Ticket numbers
Attachments: 8-3986-1 -OUT- letter from MM to EasyFit™Slipcover, LTD.
(02617523x7A3C1).pdf; 3986-1 Case ticket numbers at Tucows.com
(02617604x7A3C1).doc; Tucows easyfitcover.com Whois Result.pdf; Tucows
easyfitslipcover.com whois query .pdf; Tucows Domains easyfitslipcover co
Whois Result.pdf; 3986-1 Tucoows Policy (02619422x7A3C1).doc

Tucows Inc.
96 Mowat Avenue Toronto
Ontario M6K 3M1

Re: TICKET NUMBERS: 490994; 490996 AND 490998

Domain names: easyfitcover.com easyfitslipcover.com and easyfitslipcover.co.

Dear Tara Y,

I have not received a substantive response to my client's request that the above domain name be suspended, given that they infringe on my client's registered trademark.

My letter is attached. Also attached are the three "tickets" issued, relative to which Tucows took no action, other than to observe that Tucows' does not "operate" the offending websites.

There is no question that Tucows is the REGISTRAR and thereby controls the use of the three infringing domain names in dispute herein. See the reports attached.

These reports show that Tucows is aiding and abetting the London UK owner of these domains to hide under a veil of secrecy (although its name and the name of its Moroccan principal are now known to my client).

We understand from reviewing certain sections of Tucows website, that your company's policy is to adhere to a "Registrant First" approach to dispute resolution, regardless of how egregious your customer's actions may be. See the attached clips from your company's website describing it policy.

At the same time, Tucows is requesting the public to not name Tucows in any lawsuit, as it promises to respect the outcome of any lawsuit, i.e., Court Order.

Unfortunately, our clients Life Style Futon Inc. and Easy Fit Inc. cannot abide your company's preferences to stay clear of litigation, and will have to name your company as a defendant in the planned law suit, particularly given that the Moroccan-based owner, Mr. Et Tahiri, will make every effort to avoid and evade being served with the law suit.

We truly prefer to avoid filing any lawsuit, and instead call upon your company to transfer the infringing domains to the ownership and control of our client. You should be aware that several vending portals have suspended use of the infringing domain names of your customer of the infringing domain names. Your company's policy or preference not to get involved is obviously designed to further its economic interest but is not legally tenable or fair.

I am looking forward to Tucows' acceptance of the present litigation-avoiding request.

Regards,

Max Moskowitz
Ostrolenk Faber LLP
845 Third Avenue, New York, NY 10022
Telephone: (212) 596-0500



Tara Y. (Tucows Inc – Compliance)

Jan 7, 2021, 13:08 EST

Hello;

This subject domain is using Tucows whois privacy protection and is not owned or hosted by Tucows.

You may also directly email the registrant via the form located at [contactprivacy.com](https://www.tucows.com/contactprivacy)

Kind Regards,
Tara Y
Compliance Officer
Tucows Inc

Tucows Inc.

Mailing Address:	96 Mowat Avenue Toronto, Ontario M6K 3M1	Head Office Address:
Business e-mail address:	dsingh@tucows.com	Short Form Prospectus Issuer:
Telephone Number:	416 818-7060	Reporting Jurisdictions:
Fax Number:	416 531-1257	Stock Exchange:


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The Tucows Domain Promise

English ▾

When you buy a domain name through a Tucows partner, you are buying more than just a domain name. You are buying a commitment to the fairest, most honest, most consumer-friendly principles and policies in the industry. Taking that commitment even a step further, we offer you this promise:

40-day no-questions asked, no-exceptions domain name rescue.

Didn't receive your domain name renewal emails? Don't worry. Couldn't renew your name by the expiry date because of some circumstance beyond your control? Don't worry. Just plain forgot to renew your domain name? Don't worry. You can get your domain back online. In many cases, depending on the domain extension and registry policies, even if it's been expired for more than a month, you just pay the regular renewal fee.

Minimal fuss if you want to transfer your domain to another registrar.

If, for any reason, you're not happy with your provider or your provider is not happy with Tucows, you should each be able to move your domain name with minimal fuss. Tucows doesn't restrict your ability to transfer your domain name from one registrar to another. It's your domain name and we recognize your right to register it with the registrar of your choice. Tucows fully adheres to ICANN rules surrounding transfers (such as the 60-day lock after initial registration or renewal) but doesn't layer on things like additional transfer locks under the guise of protecting your security.

A thoughtful, "registrant-first" approach to dispute resolution.

Tucows' approach to any domain name dispute begins with the firm belief that your domain name is your own. We also have a full-time, dedicated Compliance Team to make sure these matters get the attention they deserve. We will not allow your domain name to be used as leverage in a dispute. We will not readily "seize" your domain name under public pressure as other registrars have done.


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Legal submissions

▸ Tucows, Inc. Subpoena and Warrant Policy

▾ Submitting Court and Legal Documents to Tucows Inc.

[UDRP Complaint submission](#)
[Court Documents submission](#)

Tucows is the registrar of the domain name in dispute that is the subject of my complaint, do I need to name Tucows in the legal action I file?

No. It is not necessary to name Tucows in a legal dispute regarding a domain name registered at Tucows. Tucows will comply with any Order issued by a court of competent jurisdiction regarding the final disposition of the domain name at issue.

Is it necessary to name Contact Privacy Inc, in a legal action I file if the domain name uses Contact Privacy Inc privacy service?

No. It is not necessary to name Contact Privacy Inc. in a legal dispute. Contact Privacy Inc. is a private registration service and has no control over the domain name or any associated website content. Like Tucows, Contact Privacy Inc. will comply with any Order issued by a court of competent jurisdiction.

What should be included in court orders sent to Tucows

Court orders should be as specific as possible, but at a minimum, must include:

- The affected domain name(s)
- The specific action that Tucows or the "registrar of record" is being requested to take regarding the domain name.
- If plaintiff is seeking control of a registrant's domain name, the court order must specify the name of the domain name(s).

Can non-Canadian-based court documents be submitted?

Yes. Tucows will accept court documents from Canada, Denmark, Germany, and the U.S.A. If the documents are not in English, French, German, or Danish, we require the following:

- Original court-stamped copy, **and**
- A certified English translation of the court-stamped copy.

Are there additional requirements for Settlement Agreements?

Yes. In order for Tucows to implement terms associated with a settlement agreement, the settlement agreement must:

- Have notarized signatures from both parties;
- Specify the affected domain name(s); and
- Include a statement that the litigation will be dismissed.

Are there additional requirements for Receiverships?

Yes. All receivership orders must:

- Explicitly list the domain name(s) that are to be moved separately from other assets, and
- State that the Receiver is to manage and/or sell the domain name(s).



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Tucows has been ICANN accredited since 1999.
96 Mowat Avenue, Toronto, Ontario, M6K 3M1, Canada
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